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September 10, 2020

**VIA ECF**

Honorable Mark Falk, U.S.M.J.  
 United States District Court  
 Martin Luther King, Jr. Fed. Bldg. & U.S. Courthouse  
 50 Walnut Street  
 Newark, New Jersey 07101-0999

Re: *Allergan Sales LLC v. Sandoz, Inc. et al.*  
*Civil Action No. 17-10129 (CMC) (CLW)*

Dear Judge Falk:

This firm, together with Schiff Hardin LLC, represent Defendants, Sandoz, Inc. and Alcon Laboratories, Inc. ("Sandoz") in the above-captioned matter. As the Court is aware, new counsel have entered appearances in the case on behalf of all parties. Counsel have been conferring with each other to reach an agreed-upon set of modifications to the existing schedule, and to clarify our understanding with respect to expert reporting. On behalf of both Allergan Plaintiffs and Sandoz, we respectfully submit the following agreed-upon scheduling modifications for the Court's consideration.

Event	Current Date	Proposed Date
Opening expert reports	September 16, 2020	October 16, 2020
Rebuttal expert reports	October 29, 2020	December 23, 2020
Reply expert reports	November 19, 2020	January 22, 2021
Expert discovery deadline	December 18, 2020	February 22, 2021
Pre-trial conference	Q1 2021, date TBD by Court	Q2 2021, date TBD by Court
Trial	Q2 2021, date TBD by Court	Q2-Q3 2021, date TBD by Court

The parties are still discussing additional fact discovery requested by Sandoz, and will follow up with another letter if that issue is not promptly resolved. With respect to the expert reports, the parties

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Page 2

have met and conferred with respect to their respective burdens and the anticipated content of the opening expert reports. Plaintiffs will address secondary considerations in rebuttal expert reports, and Sandoz will respond to Plaintiffs' secondary considerations in reply expert reports. The parties reserve for trial the determination of the order of presentation of validity and secondary considerations proofs.

Should these scheduling adjustments meet with Your Honor's approval, we respectfully request that the Court "So Order" this letter. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Eric I. Abraham

ERIC I. ABRAHAM

cc: Counsel of Record via ECF

It is SO ORDERED.

A handwritten signature in black ink, appearing to read "Mark Falk", with a stylized flourish at the end.

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Hon. Mark Falk, Chief U.S.M.J.

9/11/20